

**Kevin Parsons**

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**From:** Kevin Parsons  
**Sent:** Tuesday, January 08, 2008 11:07 AM  
**To:** 'Jessica Leaven'  
**Subject:** RE: Rule 26(f) conference

When can you get the demand to me?

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**From:** Jessica Leaven [mailto:jleaven@pathlaw.com]  
**Sent:** Tuesday, January 08, 2008 11:06 AM  
**To:** Kevin Parsons  
**Cc:** Leto Copeley  
**Subject:** RE: Rule 26(f) conference

Kevin,

Thank you for your response. We are working on the demand and will provide it to you as soon as possible. However, the Certificate of Telephone Conference is currently overdue and we need to get it in. We can just include in the report that defendants have requested a settlement demand from the named plaintiffs and the named plaintiffs are in the process of preparing a demand in response to that request. Please let me know your thoughts on this.

Jessica E. Leaven  
Patterson Harkavy LLP  
(919) 942-5200  
[www.pathlaw.com](http://www.pathlaw.com)

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**From:** Kevin Parsons [mailto:KParsons@pcwlawfirm.com]  
**Sent:** Tuesday, January 08, 2008 9:37 AM  
**To:** Jessica Leaven  
**Subject:** Rule 26(f) conference

Jessica,

I received your phone message. I am in the middle of trial preparation, but wanted to respond to you. It was my understanding that you would be providing me a statement of the damages and other relief your clients are seeking. That is part of what we discussed in the conference and I think it should be reflected in the report. Otherwise, we may need to include in the report that a court hearing is requested on that subject. Please provide that to me so we can finish the report. Thanks.

**Kevin Parsons**

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**From:** Kevin Parsons  
**Sent:** Tuesday, January 08, 2008 11:16 AM  
**To:** 'Jessica Leaven'  
**Subject:** RE: Rule 26(f) conference

Tell me what wage/hour information is needed other than W-2's.

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**From:** Jessica Leaven [mailto:jleaven@pathlaw.com]  
**Sent:** Tuesday, January 08, 2008 11:15 AM  
**To:** Kevin Parsons  
**Cc:** Leto Copeley  
**Subject:** RE: Rule 26(f) conference

Hopefully in a couple of weeks. I am still trying to collect all of the W-2 information and will be able to make a rough estimate of the OT loss. If you could provide me with their W-2s and wage/hour information, I could expedite the process.

Jessica E. Leaven  
Patterson Harkavy LLP  
(919) 942-5200

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When can you get the demand to me?

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**Sent:** Tuesday, January 08, 2008 11:06 AM  
**To:** Kevin Parsons  
**Cc:** Leto Copeley  
**Subject:** RE: Rule 26(f) conference

Kevin,

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**To:** Jessica Leaven

**Subject:** Rule 26(f) conference

Jessica,

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*Pursuant to our telephone conversation today, please make the following revisions to the Joint Rule 26(f) Report.*

*On page 5, under Paragraph 6. Motions. 1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence, please change to "Responses and replies are due within thirty and ten days, respectively."*

*On page 6 under Paragraph 7. Amendment of the Pleadings, please delete second sentence which reads: "After that date the Court will consider whether the granting of leave would delay trial."*

*On page 6 under Paragraph 9. Other, please insert the following to be the first paragraph in that section: "The parties request a conference with the Court before the entry of the scheduling order for the purpose of facilitating settlement. Settlement will be enhanced by a conference with the Court."*

*Please forward a revised version for review before filing with the Court.*

**Thanks**

Vickie King  
Parks, Chesin & Walbert, P.C.  
521 East Morehead Street  
Suite 120  
Charlotte, North Carolina 28202  
(704) 377-2770

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**From:** Kevin Parsons  
**Sent:** Monday, January 14, 2008 3:44 PM  
**To:** Vickie King  
**Subject:** FW: Simmons v. United Mortgage

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**From:** Jessica Leaven [mailto:jleaven@pathlaw.com]  
**Sent:** Friday, December 21, 2007 5:36 PM  
**To:** Kevin Parsons  
**Cc:** Leto Copeley; Ann Groninger; Burton Craige  
**Subject:** Simmons v. United Mortgage

Kevin,

Pursuant to the Rule 26(f) conference we held last Wednesday, I am attaching our proposed report. Please let me know your thoughts at your earliest convenience. Thanks.

Also, for your records and future service, I wanted to give you our correct mailing address in Chapel Hill.

Patterson Harkavy LLP  
100 Europa Drive, Suite 250  
Chapel Hill, NC 27516

Hope you have a wonderful holiday.

Jessica E. Leaven  
Patterson Harkavy LLP  
(919) 942-5200  
[www.pathlaw.com](http://www.pathlaw.com)

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